



**DEPARTMENT OF VETERANS AFFAIRS**  
**San Francisco VA Health Care System**  
**4150 Clement Street**  
**San Francisco, CA 94121**

October 30, 2020

Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation  
Department of Parks & Recreation  
1725 23<sup>rd</sup> Street, Suite 100  
Sacramento, CA 95816

Cc: ACHP

Subject: **Notification of Emergency Situation: 36 CFR 800.12(b)(2)**  
**Outdoor Seating Additions on Entry Lawn for COVID-19 Response**  
**San Francisco Veterans Affairs Medical Center (SFVAMC)**

Dear Ms. Polanco,

The San Francisco Veterans Affairs Medical Center (SFVAMC) is notifying your office of its proposed undertaking to construct an outdoor seating area on the Entry Lawn of the campus to support additional social distanced seating as part of its COVID-19 response. This undertaking is in response to the COVID-19 crisis, a National Emergency declared by the White House on March 13, 2020. SFVAMC is acting pursuant to the provisions for emergency situations at 36 CFR § 800.12(b)(2) of the regulations at 36 CFR Part 800, "Protection of Historic Properties" in order to comply with Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108 (NHPA). Pursuant to 36 CFR. 800.12(d), the Advisory Council on Historic Preservation (ACHP) has extended, until December 31, 2020, the time period for all federal agencies regarding undertakings that respond to emergencies and disaster declarations on the outbreak of COVID-19.

Under this section of the emergency review regulations, SFVAMC's responsibility is to notify the ACHP the appropriate State Historic Preservation Officer (SHPO), and any federally recognized Indian tribe that may attach religious and cultural significance to historic properties likely to be affected by the proposed undertaking and afford them an opportunity to comment within seven (7) days of notification. SFVAMC is following the emergency procedures in 36 CFR 800.12 by providing the California SHPO and ACHP seven (7) days to comment on the proposed undertaking. SFVAMC has determined that there are no federally recognized Indian tribes that may attach religious and cultural significance to historic properties likely to be affected by the proposed undertaking.

The SFVAMC is located at 4150 Clement Street, San Francisco, CA 94121 on a 29-acre site in northwest San Francisco and is a major tertiary care facility that serves as a VA regional referral center for specialized medical and surgical programs. The 12-acre SFVAMC National Register Historic District lies within the boundaries of the SFVAMC Fort Miley Campus. The Entry Lawn is a contributor to the overall historic significance of the SFVAMC per SFVAMC Historic Landscape Study completed January 14, 2020.

## Undertaking

The proposed undertaking will construct an outdoor seating area on the Entry Lawn, at the northeast corner of Building 203 (pictured in EXHIBIT 1), at the SFVAMC to support additional social distanced seating as part of its COVID-19 response. This includes the installation of three 10x10 foot concrete pads, fixed circular picnic tables (similar to EXHIBIT 3), and privacy vegetation. The layout is highlighted in EXHIBIT 2.

## Finding of No Adverse Effect

SFVAMC finds that this undertaking will have no adverse effect to the historic district because:

1. Installation of the seating area supports the historic use of the campus as a VA medical facility that provides care to Veterans.
2. The seating area will be located at the southwestern edge of the historic district, adjacent to non-contributing Building 203, and will require minimal alterations to the Entry Lawn. It will be installed in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired
3. It will not alter the historic view from Clement Street, which presents the visual face of the SFVAMC campus to the public, as the seating area will be obscured from view behind multiple extant Flowering Cherry and Catalina Ironwood trees and additional privacy vegetation that is proposed to be planted as part of this undertaking.
4. Any ground disturbing activities related to the installation of the seating area are not anticipated to identify archaeological deposits due to previous disturbance of the area by development. However, should archaeological deposits be discovered during implementation of the undertaking, SFVAMC will utilize the procedures detailed in "Stipulation V. Inadvertent Discoveries" of the *Programmatic Agreement Among the U.S. Department of Veterans Affairs, Veterans Health Administration, San Francisco Veterans Affairs Medical Center, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer Regarding the Long Range Development Plan for the San Francisco Veterans Affairs Medical Center*.

SFVAMC finds that due to the aforementioned reasons, this undertaking is in accordance with the Secretary of the Interior's Standards for Rehabilitation, and consequently finds that it will have no adverse effect to historic properties.

## Summary

As this project is in response to a need for social distanced seating for Veterans during a national and state emergency, we are sending this letter to notify the California SHPO and ACHP prior to the implementing the undertaking, and affording your office the opportunity to comment within seven (7) days of notification per 36 CFR § 800.12(b)(2). We believe that the installation of the concrete pads, picnic tables, and vegetative screening will have no adverse effect to historic properties, and we are seeking your comments.

Sincerely,



Bonnie S. Graham, MBA  
Medical Center Director



*If you have questions or comments about this project, please contact Matthew Szeto, Acting Chief, Capital Planning and Development, [Matthew.Szeto@va.gov](mailto:Matthew.Szeto@va.gov) or (415) 221-4810 x 22858.*

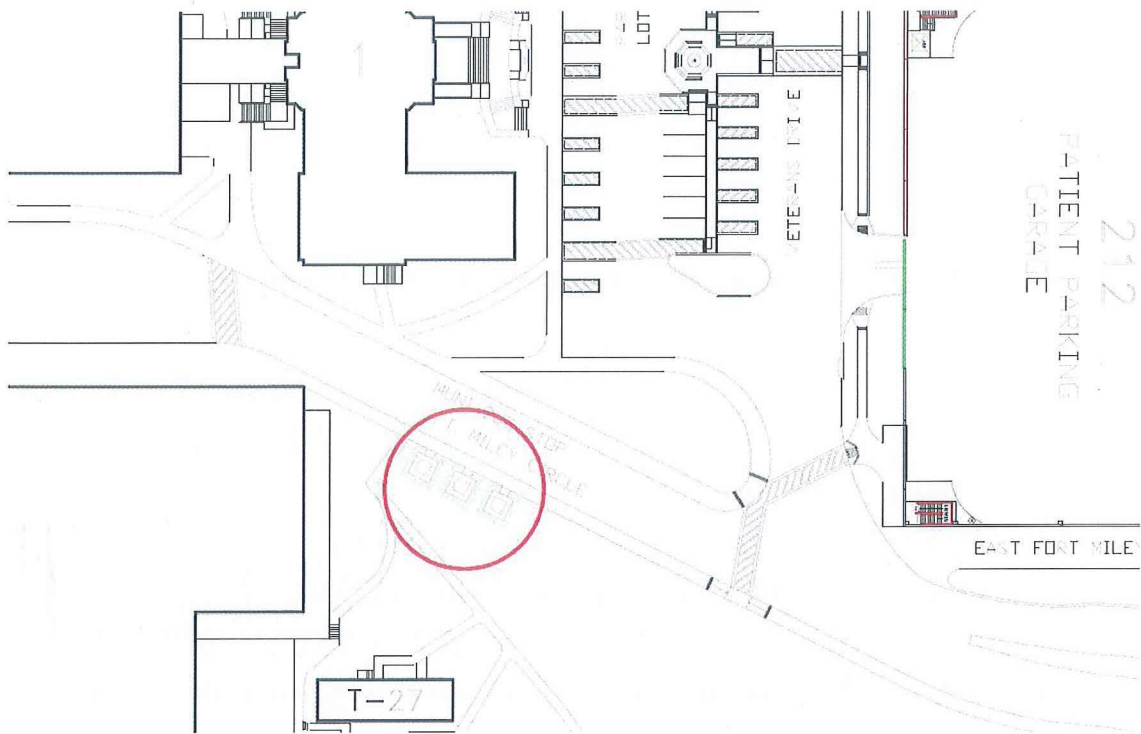
Attachments: Exhibit 1: Photo of the Entry Lawn-page 3  
Exhibit 2: Schematic Design Plan for Picnic Tables-page 4  
Exhibit 3: Photo of type of Picnic Tables to be installed-page 4



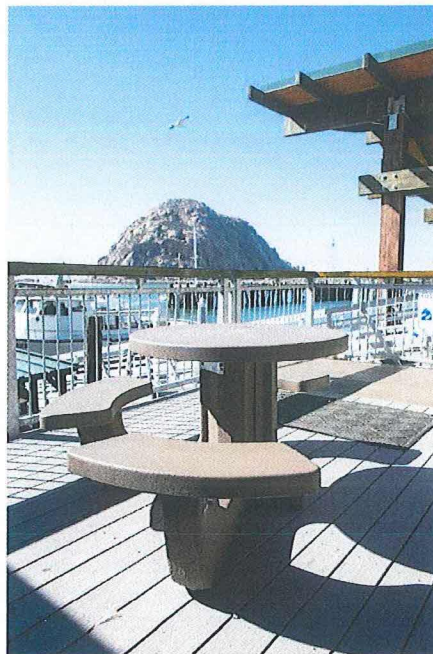
Entry lawn at the main entrance from Clement Street.

Source: SFVAMC Historic Landscape Study

**Exhibit 1:** Photo of the Entry Lawn



**Exhibit 2:** Schematic Design Plan for Picnic Tables



**Exhibit 3:** Photo of type of Picnic Tables to be installed